

# EXHIBIT Z



**NO. 4:21:CV-05075-MKD}**

**JESSE REYES, DANIEL REYNOSO, LEAGUE OF UNITED LATIN  
AMERICAN CITIZENS, LATINO COMMUNITY FUND OF WASHINGTON**

**VS**

**BRENDA CHILTON, ET AL.**

**DEPONENT:**

**SKIP MOORE**

**DATE:**

**May 24, 2023**

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1 BY MS. RIVAS:

2 Q. I'm sorry, you said you work with CAFE?

3 A. Yeah, I'm forgetting what the acronym stands  
4 for. It's a local group that helps primarily Latino,  
5 but all citizens to become U.S. citizens to they help  
6 them through the process of becoming a you U.S. citizen.

7 Q. Okay. What kind of work does Chelan County  
8 county do with CAFE?

9 A. Well, I liaise with them as far as they're  
10 always looking -- they quite often are conducting voter  
11 registration drives and those type of things. We  
12 provide them with the voter registration forms so they  
13 can connect those drives. As well as when the schedules  
14 line up correctly, I would personally attend the  
15 immigration ceremonies to -- and be there to register  
16 voters right after they get sworn in as U.S. citizens.

17 Q. How often do those immigration ceremonies take  
18 place?

19 A. They probably have, in the county, probably  
20 maybe three a year, it depends on numbers.

21 Q. Does the county perform any kind of education  
22 or training on signature verification for voters at  
23 large in Chelan County?

24 MS. CASTILLO: Object to form.

25 THE WITNESS: No specific trainings. We make a

1 note of how important it is to use the signature that  
2 you use when you register to vote and on your  
3 registration form or with your -- receiving your  
4 driver's license. We discuss that in our local voters'  
5 pamphlet, but that would be the extent.

6 BY MS. RIVAS:

7 Q. So we talked earlier about the local voters'  
8 pamphlet, but just now you mentioned the registration  
9 form.

10 Are you referring to the voter registration  
11 form or the voter registration form through, for  
12 example, the Department of Motor Vehicles in Chelan?

13 MS. CASTILLO: Object to form.

14 THE WITNESS: When you say -- are you saying  
15 when I say we instruct voters to use a voter  
16 registration form signature or their driver's license  
17 signature form, is that --

18 BY MS. RIVAS:

19 Q. Yeah. Yeah, where do you instruct that, apart  
20 from the local voters' pamphlet?

21 MS. CASTILLO: Object to form.

22 THE WITNESS: I don't know that we were  
23 instructed anywhere else.

24 BY MS. RIVAS:

25 Q. Okay. Thank you. I would like to have you

1 right side of the document, the first full paragraph, it  
2 says, every ballot -- every valid ballot requires a  
3 signed declaration. Staff verifies that the signature  
4 accompanying the ballot matches the signature on the  
5 voters registration record.

6 Do you see that?

7 A. Yes, I do.

8 Q. Okay. We're in the right place.

9 Then it says, voters using an AVU have the  
10 option of providing photo identification if they have  
11 difficulty assembling a ballot packet together.

12 What does that mean, AVU?

13 A. That term has changed back and forth, but it's  
14 an assisted voting unit -- assistance voting unit, I  
15 believe is the term we're using now. It's a voting  
16 machine designed to allow folks with either motor skills  
17 or sight problems to vote about unaided.

18 Q. Okay. The next section -- the next sentence  
19 reads, before verifying signature, staff must attend  
20 signature verification training and sign an oath with  
21 the auditor's office.

22 Did you see that?

23 A. I do.

24 Q. What does -- what does that mean, that  
25 sentence?

1 MS. CASTILLO: Object to form.

2 THE WITNESS: Everybody in the elections office  
3 has been deputized, and they've taken an oath to such,  
4 to be a deputy auditor so that's where we're discussing  
5 the oath. And I -- it's a policy that anyone that is  
6 checking signatures has attended the signature  
7 verification training.

8 BY MS. RIVAS:

9 Q. What I'm trying to find out, if that means they  
10 only have to attend signature verification training once  
11 or each time before there is an election?

12 MS. CASTILLO: Object to form.

13 MS. RIVAS: There is no requirement that anyone  
14 has to attend signature verification more than once. So  
15 in answer of your question, no, there is not a  
16 requirement that they must attend signature verification  
17 every time prior to an election.

18 BY MS. RIVAS:

19 Q. So is it Chelan County's policy that the  
20 elections staff only has to go through signature  
21 verification training once?

22 MS. CASTILLO: Object to form.

23 THE WITNESS: No. We as a group attend it as  
24 often as we can, and it works out probably about once a  
25 year. And that's more of a guideline that I put in

1 place.

2 BY MS. RIVAS:

3 Q. And when did you put that guideline in place?

4 A. Back when I started back in 2002.

5 Q. You mean 2009?

6 A. Oh, as auditor, it would have been 2009. I was  
7 the elections director back in 2002. So I've been doing  
8 elections a long time.

9 Q. Okay. Thank you for that clarification.

10 So when you say your elections staff does a  
11 group training once a year --

12 A. Yes.

13 Q. -- does that include you?

14 A. Yes.

15 Q. So you attend elections training once a year?

16 MS. CASTILLO: Object to form.

17 BY MS. RIVAS:

18 Q. I'm sorry -- strike that.

19 Sir, you attend signature verification training  
20 once a year; is that correct?

21 A. By and large. When I say once a year, it may  
22 be 18 months at a time based upon when the trainings are  
23 available and schedules match, but we do as best we can  
24 as to by and large, attend some sort of signature  
25 verification annually.

1 Q. And who conducts those signature verification  
2 trainings that you and your staff attend generally once  
3 a year?

4 MS. CASTILLO: Object to form.

5 THE WITNESS: It used to be up until mid COVID,  
6 I believe, it was conducted by the Washington State  
7 Patrol. Post COVID, it is -- it's provided by  
8 instructors who are contracted by the Secretary of  
9 State, and if -- and my recollection is most of them  
10 used to be with the Washington State Patrol.

11 BY MS. RIVAS:

12 Q. When you say post COVID, do you mean 2021,  
13 2022?

14 MS. CASTILLO: Object to form.

15 THE WITNESS: Probably right around 2021-ish is  
16 when that transition occurred.

17 BY MS. RIVAS:

18 Q. Is there a reason that you -- that you -- that  
19 the elections department changed from being trained by  
20 the Washington State Patrol to instructors contracted by  
21 the Secretary of State?

22 MS. CASTILLO: Object to form.

23 THE WITNESS: Other than that was the only  
24 training available to the elections department.

25



## C E R T I F I C A T E

STATE OF WASHINGTON                    )  
  ) SS.  
COUNTY OF PIERCE                    )

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